

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

RECEIVED

FEB 22 2001

FCC MAIL ROOM

In the Matter of)

Reallocation of the 216-220 MHz,
 1390-1395 MHz, 1427-1429 MHz,
 1429-1432 MHz, 1432-1435 MHz,
 1670-1675 MHz, and 2385-2390 MHz
 Government Transfer Bands

)
)
)
)
)

ET Dkt. No. 00-221 /
 RM-9854

COMMENTS OF THE SOUTHERN CONNECTICUT GAS COMPANY

The Southern Connecticut Gas Company files these comments in support of the Petition filed by Itron, Inc. to allocate the 1427-1429 MHz band, on a primary basis, for utility telemetry operations, including automatic meter reading ("AMR"), and to allow utility telemetry and AMR operations to share the 1429-1432 MHz band on a co-primary basis with the medical telemetry service, as described in Option 2 of the Commission's notice of proposed rulemaking ("NPRM") in the above-referenced proceeding.

DISCUSSION

The Southern Connecticut Gas Company ("Southern") is a public utility company that distributes natural gas to approximately 160,000 customers within its franchise area in the State of Connecticut. Southern has made a substantial investment in both time and money to implement an Itron, Inc. automatic meter reading system upon which Southern depends to obtain accurate meter readings in order to bill its customers for service provided.

In 1992, Congress directed the federal government to foster the development of new and innovative AMR technologies believing that such technologies would lead to efficient

No. of Copies rec'd
 List A B C D E

energy use and would protect the public health and safety.¹ Since that time the Commission has authorized use of the 1427-1432 MHz (“1.4 GHz”) frequency bands for AMR service on a nationwide basis. Now the FCC has received a petition from Itron, Inc. (“Itron”) requesting a formal allocation of the 1427-1432 MHz band for utility telemetry and AMR. Several other parties filed petitions for rulemaking requesting allocation of certain of the 1.4 GHz band for various other uses, some of which are incompatible with using the band for utility telemetry and AMR.

In its *NPRM*, the FCC proposes three options for allocation of the 1.4 GHz spectrum. Southern supports the adoption of Option 2, which would allocate the 1427-1429 MHz band on a primary basis exclusively for telemetry operations and the 1429-1432 MHz band on a co-primary basis to utility and medical telemetry. Adopting Option 2 would continue the Commission’s policies, serve the substantial public interest in providing a “home” for AMR, and protect the substantial investment made by utilities and other critical infrastructure companies who are deploying telemetry services.

Use of the 1.4 GHz band for AMR helps to support critical infrastructure industries, who need wireless technologies to monitor systems remotely and to collect data from distant and widely dispersed locations in a timely and cost-effective manner. AMR technologies enhance utility productivity and efficiency and speed responses to natural disasters or other system anomalies that may pose a threat to public health or safety. In addition:

- AMR increases utility productivity and efficiency, making it possible for a meter reader to increase by a factor of ten, twenty, or more the number of meters that can be read in an eight-hour shift; obviates the need for estimated bills and multiple trips to customer homes; and improves a utility’s ability to detect meter tampering and theft of services.

¹ *Telephone and Dispute Resolution Act*, Pub. L. No. 102-556, 106 Stat. 4181 (1992). Congress remains concerned about the use of spectrum for utility use including recommending that NTIA conduct a study on energy, water, and railroad spectrum use in one of its appropriations bills and directing the FCC to issue a report regarding the same. H.R. Rep. No. 106-1005, at 114-115 (2000).

- AMR establishes a direct link between a utility and its customer premises utility meters, enabling the utility to offer its customers a variety of strategies to reduce peak demand and shift usage to off-peak hours, as well as encourage conservation by providing customers with detailed, real-time price and consumption data.
- AMR is a necessity in a deregulated utility environment in which separate entities may be competing in the generation, transmission, wholesaling, and distribution to end users of energy. Reconciling the multiple, overlapping transactions involving these service providers requires consumption information on a daily basis, and in some cases more frequently.

Because of such benefits, AMR use is increasing and will continue to do so in the future. Southern uses AMR to read its meters and detect tampering.

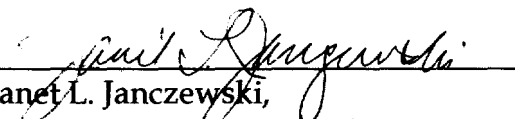
Utilities have invested many millions of dollars in AMR networks at 1.4 GHz. Neither Option 1 nor Option 3 would allow AMR services to continue to use the complete spectrum range in which AMR investments are currently used. There is no benefit to providing utilities access to other frequency bands for AMR, as set out in Option 1. The AMR installed base and all equipment development is in the 1427-1432 MHz band. In addition, the benefits to utilities from having access to 2 MHz of paired frequencies, as provided in Option 1, would not make up for the loss of the benefits of AMR and other telemetry.

Under Option 3, AMR service users lose the use of the 1430-1432 MHz band to Little LEOs and PMRS while obtaining the 1427-1430 MHz band for use on a co-primary basis with WMTS. Either of these two options would cause AMR service users to lose spectrum and would prove costly, disruptive, and inefficient. Neither option upgrades AMR status throughout the entire spectrum band in which AMR currently operates, as would be provided for by Option 2.

For all of these reasons, Southern, in support of Itron, Inc. urges the Commission to adopt Option 2.

Respectfully,

The Southern Connecticut Gas Company

By 
Janet L. Janczewski,
Senior Corporate Counsel and
Secretary